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FILED IN UNITED STATES DISTRICT
COURT, DISTRICT OF UTAH
MAY 29 2007
BY D. MARK JONES, CLERK
DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,	:	NO. 2:07MJ200 PMW
	:	
Plaintiff,	:	COMPLAINT
	:	
Vs.	:	VIO. 18 U.S.C. §2241(a) and 1153(a),
	:	Aggravated Sexual Abuse of a
HARRISON BEGAYE,	:	Child While Within Indian
	:	Country;
Defendant.	:	VIO. 18 U.S.C. § 113(a)(3) and 1153(a),
	:	Aggravated Assault with a
	:	Dangerous Weapon While Within
	:	Indian Country.

Before Paul M. Warner, United States Magistrate Judge for the District of Utah,
appeared the undersigned, who on oath deposes and says:

COUNT I
(18 U.S.C. § 2241(a))

On or about an unknown date between August 1, 2002 and May 9, 2007, in the
Central Division of the District of Utah,

HARRISON BEGAYE,

the defendant herein, an enrolled member of the Navajo Nation, while within the boundaries of the Navajo Indian Reservation, did knowingly cause Ja.B. (D.O.B. 1/22/96) to engage in a sexual act by using force against her, and attempted to do so; all in violation of 18 U.S.C. § 2241(a)(1) and 1153(a).

COUNT II
(18 U.S.C. § 113(a)(3))

On or about an unknown date between January 12, 1998 and May 9, 2007, in the Central Division of the District of Utah,

HARRISON BEGAYE,

the defendant herein, an enrolled member of the Navajo Nation, while within Indian country, did knowingly assault Je.B. (D.O.B. 1/12/98), with a dangerous weapon, namely a BB gun, with intent to do bodily harm; all in violation of 18 U.S.C. §§ 113(a)(3) and 1153(a).

Complainant, Michelle Pickens, being first duly sworn, states that this complaint is based on the following:

I am a Special Agent with the Federal Bureau of Investigation (hereinafter FBI), presently assigned to work white collar crime at the Salt Lake City Field Office. I have been a Special Agent with the FBI for approximately 8 years.

I have talked personally with Special Agent Rachel Boisselle who participated in this investigation and am familiar with the information contained in this affidavit through personal discussions with her and others. The following information is derived from my

personal discussions with her regarding her observations, review of physical evidence, and interviews of witnesses and the defendant.

1. This affidavit is made in support of an application for a warrant to arrest Harrison Begaye and proceed on the charges listed in this Complaint.

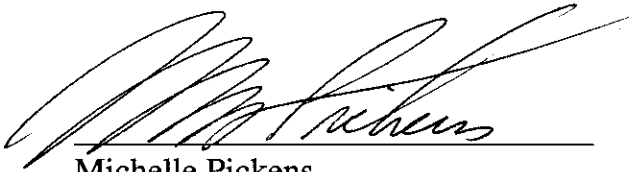
2. During a forensic interview, Ja.B. (D.O.B. 1/22/96) reported that her father, Harrison Begaye, is raping her. She stated that her father puts lotion on his private part and then puts her on top of him and puts his private part in her hole. When asked to show where her father puts his private part, she pointed to the vaginal area of a diagram.

3. During a medical interview, Je. B. (D.O.B. 1/12/98) reported that his father, Harrison Begaye, shot him in the face with a BB gun and threw something sharp at him that stuck in his face and he had to pull it out. A medical exam revealed a BB still embedded in Je. B.'s skin near his nose and also a scar on his face where he said the sharp object hit him.

4. Harrison Begaye was interviewed by FBI agents Boisselle and Larson. He admitted that he has been having sexual intercourse with Ja. B. for the last three months. He said that it was nothing hard core, just penis in the vagina. He denied shooting Je. B. with a BB gun.

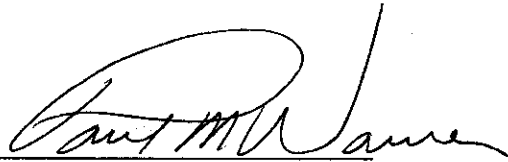
5. I have verified that Harrison Begaye is an enrolled member of the Navajo Indian Tribe and the location of the offenses were at his residence which is within the borders of the Navajo Nation.

6. Based upon all of the information contained in the foregoing Affidavit in Support of Complaint, I believe that there is probable cause to believe that Harrison Begaye did forcibly engage in a sexual act with Ja. B., a child under the age of 12 years old and did assault Je. B. with a dangerous weapon with intent to do bodily harm, all within Indian Country, all in violation of Title 18 United States Code §§ 2241(a) and 113(a)(3) and 1153(a).



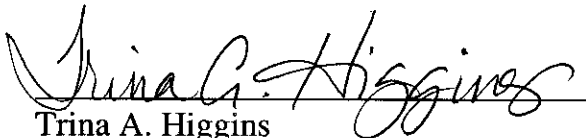
Michelle Pickens
Special Agent, FBI

SUBSCRIBED AND SWORN TO BEFORE ME this 29th day of May, 2007.



PAUL M. WARNER
United States Magistrate Judge

APPROVED:
BRETT L. TOLMAN
ACTING UNITED STATES ATTORNEY



Trina A. Higgins
Assistant United States Attorney